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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

** ALL PAPERS SHALL BE FILED IN THE
LEAD CASE, NO. 19-30088 (DM).*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REQUEST FOR ENTRY OF ORDER BY
DEFAULT ON MOTION FOR ENTRY OF
AN ORDER FURTHER EXTENDING
DEADLINE FOR THE REORGANIZED
DEBTORS TO OBJECT TO CLAIMS AND
FOR RELATED RELIEF**

[Re: Docket No. 14609]

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RELIEF REQUESTED IN THE MOTION

The Motion seeks entry of an order: (i) further extending the deadline established under the Chapter 11 Reorganization Plan for the Reorganized Debtors to object to General Claims by an additional one hundred eighty (180) days, through and including June 16, 2025, without prejudice to the Reorganized Debtors' right to seek additional extensions thereof; and (ii) granting related relief. A proposed order (the "**Proposed Order**") was attached as Exhibit A to the Motion.

NOTICE AND SERVICE

A notice of hearing on the Motion was filed on October 15, 2024 [Docket No. 14611] (the “**Notice of Hearing**”). The Motion, the Notice of Hearing, and the supporting declaration of Robb C. McWilliams [Docket No. 14610] were served as described in the Certificate of Service of Melissa Diaz, filed on October 23, 2024 [Docket No. 14617]. The deadline to file responses or oppositions to the Motion has passed, and no responses or oppositions have been filed with the Court or received by counsel for the Reorganized Debtors.

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1. I am an attorney with the firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

3. This declaration was executed in San Francisco, California.

Dated: October 30, 2024

Attorneys for Debtors and Reorganized Debtors